

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department of Telecommunications)	
and Energy on its own motion pursuant to G.L. c. 159,)	
§§ 12 and 16, into Verizon New England Inc., d/b/a)	D.T.E. 01-34
Verizon Massachusetts' provision of Special Access)	
Services.)	

REQUEST FOR EXTENSION OF TIME

Verizon Massachusetts ("Verizon MA") hereby requests that the Department grant this Request¹ for additional time to respond to the following discovery requests: DTE-IR-4-17 and DTE-IR-4-24. In addition, Verizon MA seeks a partial extension for filing certain data relating to the following discovery requests: DTE-IR-4-1 and WCOM/ATT-IR-4-17. In support of its Request, Verizon MA states as follows:

On February 14, and February 15, 2002, Verizon MA received more than 50 discovery requests combined from the Department, WorldCom and AT&T Communications of New England, Inc. ("AT&T") in this proceeding. A number of those requests were resource-intensive, requiring that data be developed and analyzed in response to those requests. Verizon MA filed its replies to the vast majority of those requests. This Request for Extension is limited to only a handful of discovery replies.

In DTE-IR-4-17, Verizon MA is asked to provide the five most common reasons for Access Service Request ("ASRs") to be sent back to the customer, to rank those

¹ This Request is filed in accordance with the Department's Ground Rules, as amended on January 10, 2002, requiring that parties notify the Department to request an extension for late-filed discovery responses, *i.e.*, more than ten business days from the date of receipt of the request.

reasons (from most to least), to identify the percentage of ASRs that fall into each of those five categories. That information is requested on a monthly basis for the year 2001. In DTE-IR-4-24, Verizon MA is asked to provide the number of circuits for which an ASR was either rejected or queried within 24 hours for affiliated and non-affiliated carriers on a monthly basis.

Verizon MA does not track the data sought by the Department in DTE-IR-4-17 and DTE-IR-4-24 in the normal course of business. Accordingly, Verizon MA is in the process of determining to what extent that information is available in the form requested and for the time period requested. Verizon MA requires an additional seven to ten calendar days to determine the availability of that data, as well as assemble and verify the data obtained.

Likewise, Verizon MA requires additional time to compile and confirm certain wholesale data updates relating to DTE-IR-4-1. On March 1, and March 4, 2002, Verizon MA filed extensive wholesale and retail information regarding its special access services for all but two categories (*i.e.*, updates to WCOM/ATT-IR-1-2 and WCOM/ATT-IR-1-18). Since the outstanding data for DTE-IR-4-1 concerns wholesale only, the extension sought by Verizon MA here is a partial extension.

Verizon MA also seeks a partial extension for responding to WCOM/ATT-IR-4-17, which requests both wholesale and retail data relating to the number of open orders (backlog) that have been in a hold status for more than 10 calendar days or 30 calendar days. This data is constantly changing, and additional time is necessary to verify the accuracy of the retail data obtained by Verizon MA specifically for this reply. Verizon MA is filing the wholesale data relating to WCOM/ATT-IR-4-17 on March 4, 2002. As

with DTE-IR-4-17 and DTE-IR-4-24, the information requested in WCOM/ATT-IR-4-17 is not tracked by Verizon MA as part of its normal practices, and must be captured on a “snapshot” basis to be responsive to this discovery request.

WHEREFORE, for all of the foregoing reasons, Verizon MA has demonstrated that good cause for an extension exists. Therefore, Verizon MA respectfully requests that the Department grant its request for an extension of the due date for its filing of the above discovery replies to no later than ten calendar days from their original due date, *i.e.*, March 4, 2002.

Respectfully submitted,

VERIZON MASSACHUSETTS

Its Attorney,

Barbara Anne Sousa
185 Franklin Street, Rm. 1403
Boston, Massachusetts 02110-1585
(617) 743-7331

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